FILED
DEC 1 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	No. 4:16CR513HEA/JMB
DE'JANAY NOLDON,	)	
Defendant.	)	

INDICTMENT

The Grand Jury charges that:

Counts One-Two

(Mail Fraud)

A. Introduction

At all times relevant to the Indictment:

1. "OLOLA" is a senior independent living community in St. Louis, Missouri.

2. "SHC" is an elder care company located in the Eastern District of Missouri.

3. Edward Jones is a federally insured financial institution.

4. "MKS" was a resident at OLOLA. MKS has a medical condition that requires her to employ caregivers to assist her.

5. **NOLDON** was employed as a certified nurse's assistant (CNA) caregiver with SHC from about February 18, 2016 to May 21, 2016.

6. **NOLDON** was assigned to be one of MKS's caregivers. **NOLDON** had regular access to MKS's residence at OLOLA. The general scope of **NOLDON'S** employment as a caregiver included: performing light housekeeping; providing transportation to scheduled appointments and errands; meal preparation; and assisting with personal hygiene and medication. **NOLDON** was not

authorized to engage in any financial transactions on behalf of MKS.

7. **NOLDON** provided elder care to "T.G." and "E.G.".

B. The Scheme to Defraud

8. Beginning on or about March 1, 2016, and continuing through on or about October 31, 2016, both dates being approximate and inclusive, in the Eastern District of Missouri and elsewhere, the defendant,

DE'JANAY NOLDON,

devised, intended to devise, and knowingly participated in a scheme to defraud and obtain money from MKS, TG, EG, Edward Jones, and other businesses in the approximate amount of $30,000.00, by means of materially false and fraudulent pretenses, representations, and promises, to wit: that the defendant fraudulently assumed the identity of MKS in order to engage in a variety of financial transactions for the defendant's benefit.

9. It was part of the scheme and artifice to defraud that on or about March 31, 2016, **NOLDON** used MKS's personal information to fraudulently obtain a Citibank credit card, *8482. **NOLDON** fraudulently used that credit card to make numerous personal purchases; obtain cash advances; and pay utility bills.

10. It was part of the scheme and artifice to defraud that on or about April 29, 2016, MKS's Edward Jones investment account, account number *-1-9, was compromised when an unauthorized online account was activated.

11. It was part of the scheme and artifice to defraud that on or about April 29, 2016, an online attempt was made to fraudulently transfer $5,000.00 from Edward Jones investment account *1-9 to **NOLDON's** Citibank prepaid credit card ending in *4822.

12. It was part of the scheme and artifice to defraud that on or about April 29, 2016, a Credit One credit card was applied for online using MKS's personal information. Credit One

approved MKS for a line of credit and mailed credit card *7110 to MKS's residence at OLOLA.

13. It was part of the scheme and artifice to defraud that on or about May 3, 2016, three attempted fraudulent online transfers of $5,000.00, $4,000.00, and $2,000.00 were made from account *1-9 to **NOLDON'S** Citibank prepaid credit card ending in *4822.

14. It was part of the scheme and artifice to defraud that on or about May 5, 2016, two fraudulent online transfers of $4,000.00 and $2,000.00 were made from Edward Jones investment account *1-9 to **NOLDON'S** Citibank prepaid credit card ending in *4822.

15. On or about May 6, 2016, a fraudulent transfer of $8,550.00 from MKS's Edward Jones retirement account to Edward Jones investment account *1-9 was completed. Edward Jones became aware the fraudulent activity and reversed the transaction before MKS's accounts experienced any loss.

16. On or about May 19, 2016, **NOLDON** fraudulently used a First Bank account, *083, belonging to TG and EG to make a payment on *8482.

17. It was part of the scheme and artifice to defraud that on or about May 21, 2016, **NOLDON** used the fraudulently obtained Credit One credit card *7110 at a Schnuck's grocery store in Overland, Missouri to make personal purchases in the amount of $153.02.

18. It was part of the scheme and artifice to defraud that on or about May 23, 2016, **NOLDON** used the fraudulently obtained Credit One credit card *7110 at a Sam's Club store and an Exxon-Mobil in the Metropolitan St. Louis area to make purchases which exceeded $101.00.

19. It was part of the scheme and artifice to defraud that on or about June 9, 2016, **NOLDON** fraudulently used MKS's personal information, including her social security number to submit an online application for a Barclaycard Visa credit card. Barclaycard rejected the fraudulent application and subsequently mailed to MKS via the U.S. Postal Service a letter detailing the fraudulent application and reasons for rejection.

20. It was part of the scheme and artifice to defraud that on or about August 2, 2016, **NOLDON** fraudulently added herself as an authorized user to MKS's Citibank credit card *6815. **NOLDON** thereafter fraudulently changed the account's mailing address from MKS's home address to reflect **NOLDON'S** residence on Ranch Lane in St. Louis, Missouri. **NOLDON** fraudulently used *6815 to make numerous personal purchases.

21. It was part of the scheme and artifice to defraud that between about May 15, 2016 and October 15, 2016, **NOLDON** fraudulently accessed MKS's Central Bank account, *776, and used that bank account to make payments on Citibank credit cards *6815 and *8482 in an attempt to conceal her scheme to defraud.

The Mailing

22. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

for the purpose of executing the foregoing scheme and artifice to defraud or to obtain money or property by means of false or fraudulent pretenses, representations or promises, and for the purpose of executing the scheme or artifice or attempting to do so, knowingly caused to be delivered by mail any matter or thing, fraudulent credit card bank statements, to wit:

Count	**Date**	**Item mailed**
One	6/10/2016	Credit One credit card *7110 billing statement
Two	6/9/2016	Barclaycard Visa declination letter

said correspondence having been sent and delivered by the United States Postal Service to MKS's residence in the Eastern District of Missouri.

All in violation of Title 18, United States Code, Section 1341.

Counts Three-Nine

(Bank Fraud)

23. The Grand Jury reincorporates by reference as if fully stated herein paragraphs 1-21 of this Indictment.

24. That between on or about May 1, 2016 and August 31, 2016, in the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

with the intent to defraud, devised a scheme and artifice to obtain monies under the custody and control of Edward Jones, Central Bank of St. Louis, and First Bank, all of which were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations, and promises, in that she caused and attempted to cause the following fraudulent transfers of funds, to wit:

Count	Date	Amount	From	To
Three	5/3/16	$5,000.00	Ed. Jones invest. acct. *1-9	Citibank *4822
Four	5/5/16	$4,000.00	Ed. Jones invest acct. *1-9	Citibank *4822
Five	5/6/16	$8,550.00	Ed. Jones retirement acct.	Ed. Jones invest. acct *1-9
Six	6/26/16	$6,816.70	Central Bank *776	Citibank *8482
Seven	6/29/16	$6,688.95	Central Bank *776	Citibank *8482
Eight	8/11/16	$3,514.98	Central Bank *776	Citibank *8482
Nine	5/19/16	$200.00	First Bank *083	Citibank *8482

All in violation of Title 18, U.S.C., Section 1344.

Count Ten

(Identity Theft)

25. The Grand Jury reincorporates by reference as if fully stated herein paragraphs 1-21 of this Indictment.

26. On or about May 21, 2016, in Overland, Missouri, which is within the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

in a matter affecting interstate commerce, did knowingly possess or use, without lawful authority, a means of identification of another person, to wit, the name of MKS on a Credit One credit card, account number *7110, during a transaction at a Schnuck's grocery store, with the intent to commit, or in connection with, the offenses of: wire fraud, Title 18, United States Code, Section 1343 and forgery, RSMo 570.090

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

Count Eleven

(Aggravated Identity Theft)

27. The Grand Jury reincorporates by reference as if fully stated herein paragraphs 1-21 of this Indictment.

28. On or about May 31, 2016, in the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

did knowingly possess, transfer or use, without lawful authority, a means of identification of another person, to wit, the name and social security number of MKS to fraudulently obtain a Citibank credit card, *8482, during and in relation to the commission of the felony offense of wire fraud, Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1028A and 2.

Count Twelve

(Identity Theft)

29. The Grand Jury reincorporates by reference as if fully stated herein paragraphs 1-21 of this Indictment.

30. On or about May 23, 2016, in Maplewood, Missouri, which is within the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

in a matter affecting interstate commerce, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name of MKS while using Citibank credit card *8482 during a transaction at a Sam's Club, with the intent to commit, or in connection with, the offenses of wire fraud, Title 18, United States Code, Section 1343 and forgery, RSMo 570.090

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

Count Thirteen

(Aggravated Identity Theft)

31. The Grand Jury reincorporates by reference as if fully stated herein paragraphs 1-21 of this Indictment.

32. On or about June 9, 2016, in the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name and social security number of MKS during an attempt to obtain a Barclaycard Visa credit card, during and in relation to the commission of the felony offense of wire fraud, Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1028A and 2.

Count Fourteen

(Social Security Fraud)

33. The Grand Jury reincorporates by reference as if fully stated herein paragraphs 1-21 of this Indictment.

34. On or about June 9, 2016, within the Eastern District of Missouri, the defendant,

DE'JANAY NOLDON,

in a matter within the jurisdiction of the United States Social Security Administration, for the purpose of obtaining something of value and for other purposes, knowingly, and with the intent to deceive, falsely represented for the purpose of obtaining a credit card with Barclaycard Visa, that the defendant's social security number was xxx-xx-2359, when in fact, as defendant well knew, the representation was false.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL.

____
FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

____
JENNIFER J. ROY, #47203MO
Assistant United States Attorney